



American Planning Association
California Chapter

Making Great Communities Happen

November 12, 2013

Paul Massera
California Water Plan Update 2013
California Department of Water Resources
PO Box 942836, Sacramento, CA 94236-0001
cwpcom@water.ca.gov

Subject: Comments on Draft Water Plan Update 2013

Dear Mr. Massera:

The American Planning Association California Chapter (APACA) appreciates the opportunity to comment on the Draft Water Plan Update 2013. We also appreciate the opportunity to have served on the Water Plan Update's Public Advisory Committee for the last two updates.

Overall, we support Update 2013's thoughtful and comprehensive treatment of long-term land use and flood management issues, within the context of integrated water management and climate change, in both Volume 1 (the strategic Plan) and Volume 3 (Resource Management Strategies). Update 2013's policy recommendations are generally consistent with APACA's Legislative Platform, which encourages implementation of "smart planning principles" articulated in 2002's AB 857: encouraging infill first, then growth near existing urbanized areas, while at the same time protecting resource, open space and agricultural lands.

We also appreciate the inclusion of a Finance Planning Framework in Update 2013, which recognizes the severe financing constraints faced by local governments and special districts. Recognizing these constraints, we support Update 2013's overall approach of providing technical guidance, data, and incentives for local implementation of land use, flood management, and other recommended local actions, without recommending that these actions be mandatory.

C/O STEFAN/GEORGE ASSOCIATES
1333 36TH STREET
SACRAMENTO CA 95816-5401

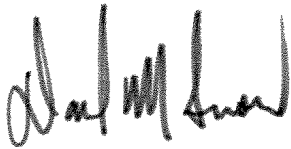
P: 916.736.2434
F: 916.456.1283
www.calapa.org

Recommendation 24 of the Agricultural Land Stewardship Resource Management Strategy, however, departs from this approach. It currently states that “counties should adopt agricultural general plan elements and designate supportive agricultural districts that enhance agricultural land stewardship on high priority, productive agricultural land.” We recommend this sentence be changed to “where appropriate, cities and counties should consider adding agricultural land preservation policies to their general plans and designate supportive agricultural districts that enhance agricultural land stewardship on high priority, productive agricultural land.”

This change recognizes that agricultural land preservation policies may not be feasible or appropriate for some jurisdictions; that cities as well as counties may want to consider these policies; and that agricultural land preservation policies can easily be added to existing general plan elements without the need to create another general plan element.

Thank you very much for considering these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'David Snow', with a stylized, cursive script.

David Snow, AICP
Vice President Policy and Legislation
APA California
dsnow@rwglaw.com

C/O STEFAN/GEORGE ASSOCIATES
1333 36TH STREET
SACRAMENTO CA 95816-5401

P: 916.736.2434
F: 916.456.1283
www.calapa.org